

[COUNSEL LISTED ON SIGNATURE PAGES]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

WILLIAM GRECIA,

Plaintiff,

V.

DISH NETWORK L.L.C.,

Defendant.

Case No. 4:16-cv-00588-YGR
[Lead Case]

[PROPOSED] SCHEDULING ORDER

As Modified by the Court

Date: NA

Time: NA

Place: NA

Judge: Hon. Yvonne Gonzalez Rogers

WILLIAM GRECIA,

Plaintiff,

V.

ADobe SYSTEMS INCORPORATED,

Defendant.

Case No. 4:16-cv-06283-YGR

WILLIAM GRECIA,

Plaintiff,

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TARGET CORPORATION,

Defendant.

Case No. 4:17-cv-00323-YGR

1 Plaintiff William Grecia (“Mr. Grecia”) and Defendants DISH Network L.L.C. (“DISH”),
2 Adobe Systems Incorporated (“Adobe”), and Target Corporation (“Target”) (collectively,
3 “Defendants”)¹, pursuant to Civil L.R. 16-9, Rule 26(f) of the Federal Rules of Civil Procedure,
4 and the Court’s rulings on July 30, 2018 (see, e.g., Dkt. Nos. 72, 43, and 49 in the *DISH*, *Adobe*²,
5 and *Target*³ cases (“July 30, 2018 Order”), respectively), by and through their respective counsel
6 of record, propose the following schedule⁴:

Date ⁵	Event	Governing Rule
August 13, 2018	Infringement Contentions	Patent L.R. 3-1 & 3-2
October 29, 2018	Completion of Court Mediation	
November 9, 2018	Invalidity Contentions	Patent L.R. 3-3 & 3-4
December 3, 2018 2:00 p.m.	Case Management Conference	
December 31, 2018	Advice of Counsel Disclosures	Patent L.R. 3-7
January 18, 2019	Close of Party Fact Discovery	
January 18, 2019	Close of Third-Party Fact Discovery	
February 8, 2019	Opening Expert Reports	
March 1, 2019	Rebuttal Expert Reports	
March 22, 2019	Close of Expert Discovery	
April 9, 2019	Last day for moving party to file a letter requesting pre-filing conference for motions for summary judgment	February 24, 2017 Standing Order

19 ¹ Unless otherwise stated, cites to the docket are from the lead case *William Grecia v.*
20 *DISH Network L.L.C.*, Case No. 4:16-cv-00588-YGR (“*DISH*”).

21 ² *William Grecia v. Adobe Systems Incorporated*, Case No. 4:16-cv-06283-YGR
22 (“*Adobe*”).

23 ³ *William Grecia v. Target Corporation*, Case No. 4:17-cv-00323-YGR (“*Target*”).

24 ⁴ Motions for summary judgment must be filed pursuant to Judge Gonzalez Rogers’
25 February 24, 2017 Standing Order in Civil Cases (“February 24, 2017 Standing Order”).

26 ⁵ The parties may seek extensions of these dates if, by November 16, 2018, a claim
27 construction order has not issued in the following cases currently pending in the Southern District
28 of New York: *Grecia v. MasterCard Int’l Inc.*, 15-cv-9059; *Grecia v. Samsung Elecs. Am.*, 16-
cv-9691; and *Grecia v. 1-800-Flowers.com, Inc.*, 16-cv-7022, and *Grecia v. J Crew Group, Inc.*,
16-cv-7025.

1	Date ⁵	Event	Governing Rule
2	April 19, 2019 April 17, 2019	Pre-filing conference for motions for summary judgment (reserved for motions with pre-filing conference requests filed on April 9, 2019)	February 24, 2017 Standing Order
3	May 1, 2019	Dispositive and <i>Daubert</i> Motions	
4	May 15, 2019	Oppositions to Dispositive and <i>Daubert</i> Motions	
5	May 31, 2019	Replies in support of Dispositive and <i>Daubert</i> Motions	
6	To be determined by the Court June 25, 2019 at 2 p.m.	Hearing on Dispositive and <i>Daubert</i> Motions	
7	32 days before Pre-Trial Conference	Last day to serve Motions in Limine	
8	To be determined by the Court	Pre-Trial Conference	
9	To be determined by the Court	Trial	
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13	Dated: August 1, 2018	Respectfully Submitted,	
14	<u>/s/ Matthew M. Wawrzyn</u>	<u>/s/ Victoria Q. Smith</u>	
15	Todd C. Atkins (SBN 208879) tatkins@atkinsdavidson.com ATKINS & DAVIDSON, APC 2261 Rutherford Road Carlsbad, CA 92008 Tel: 619.665.3476	James F. Valentine (SBN 149269) JValentine@perkinscoie.com Victoria Q. Smith (SBN 236045) VSmith@perkinscoie.com Matthew J. Moffa (pro hac vice) MMoffa@perkinscoie.com	
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27 TARGET CORPORATION

28 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

1 DATED: September 4, 2018

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3 DISTRICT JUDGE YVONNE GONZALEZ ROGERS

ATTESTATION FOR SIGNATURE

Pursuant to Civil L.R. 5-1(i)(3) regarding signatures, I attest under penalty of perjury that concurrence in the filing of this document has been obtained from the other signatories.

Dated: August 22, 2018

/s/ Ryan J. Marton

Ryan J. Marton